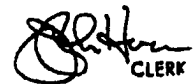


**FILED**

**AUG 09 2011**

  
CLERK

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HOWARD "JACK" ALEFF, REENA L.  
SLOMINSKI, AND ROY TORRES,

Defendants.

CR 11-10036 - 01  
- 02  
INDICTMENT - 03

CONSPIRACY TO DEFRAUD THE  
GOVERNMENT WITH RESPECT TO  
CLAIMS

18 U.S.C. § 286

The Grand Jury charges:

INTRODUCTION

At all times material herein:

Congress has provided for marketing assistance loans and loan deficiency payments for wool and mohair to eligible producers who produce and shear wool and mohair from live sheep and goats. The Loan Deficiency Payment Program is also available to eligible producers of non-graded wool in the form of unshorn pelts. The program helps stabilize America's wool and mohair industry and insures the well-being of agriculture in the United States. Loan deficiency payments are payments made to producers who, although eligible to obtain a marketing loan, agree to forego the loan in return for a payment on the eligible wool, mohair or unshorn pelt.

## COUNT 1

Between on or about April 9, 2004 and August 26, 2010, in the District of South Dakota and elsewhere, as part of a continuing offense, the defendants, Howard "Jack" Aleff, Reena L. Slominski and Roy Torres, did knowingly and willfully enter into an agreement, combination, and conspiracy with each other to defraud the Commodity Credit Corporation, a department and agency of the United States, by obtaining and aiding to obtain the payment and allowance of false, fictitious and fraudulent claims under the loan deficiency program, through the production and submission of false and fraudulent wool shearing receipts, in violation of 18 U.S.C. 286.

## OVERT ACTS

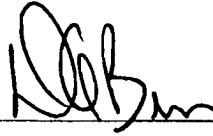
In furtherance of the conspiracy and in order to accomplish the objects thereof, the following overt acts were committed:

1. On or about between April 9, 2004 and March 13, 2008, Howard "Jack" Aleff submitted, and Reena L. Slominski and Roy Torres aided and abetted in the production and submission of 45 false applications for loan deficiency payments for sheep that were never sheared, and Howard "Jack" Aleff received \$89,862 in undeserved payments from the Commodity Credit Corporation.

2. On or about between January 24, 2005 through August 26, 2010, Reena L. Slominski submitted, and Roy Torres aided and abetted in the production and submission of 87 false applications for loan deficiency payments

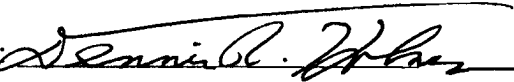
for sheep that were never sheared, and Reena L. Slominski received \$214,028 in undeserved payments from the Commodity Credit Corporation.

A TRUE BILL:

A handwritten signature in black ink, appearing to be "R. B. Johnson", written over a horizontal line.

Foreperson

BRENDAN V. JOHNSON  
UNITED STATES ATTORNEY

By: A handwritten signature in black ink, appearing to be "Brendan V. Johnson", written over a horizontal line.